

CenturyLink

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August 7, 2012

Patricia Van Gerpen
Executive Director
Public Utilities Commission
Capitol Building, 1st Floor
500 East Capitol Avenue
Pierre, SD 57501-5070

Dear Patricia:

By this letter, Qwest Corporation, d/b/a CenturyLink (CenturyLink), is requesting a waiver of the utilization threshold requirements outlined in FCC's Numbering Resource Optimization Orders, FCC 00-429 and FCC 01-362 released in CC Docket No 99-200, which would allow PA/NeuStar, the Number Pooling Administrator, to open a new NXX Code to provide 1,000 numbers to CenturyLink.

The request is for 1,000 numbers in the 605 NPA, Sioux Falls Rate Center, to meet the needs of CenturyLink to provide additional service to the State of South Dakota. Currently, the State of South Dakota is served with a 5 ESS host switch (SXFLSDCODS2). In January 2000, a second 5 ESS switch (SXFLSDCODS1) was placed in Sioux Falls to provide LATA Tandem services, E911 and serve as host for seven 5ESS remote switches. One of the remotes (SXFLSDSWRS1) provides Centrex service for the State of South Dakota. SXFLSDCODS1 currently has no "regular" customers in the Sioux Falls Wire Center. As such, the SXFLSDCODS1 switch does not have its own NPA-NXX from which a Local Routing Number (LRN) may be established. An LRN is required to allow local number portability (LNP). In order to permit the State of South Dakota in Sioux Falls to take advantage of the Centrex services they are requesting, and to keep their existing numbers in the Centrex, a new NPA-NXX is required so CenturyLink can establish an LRN for the SXFLSDCODS1 switch. CenturyLink would keep one block from this new NPA-NXX and establish an LRN from that block. Concurrently, Qwest would donate the remaining nine blocks to the industry pool for future assignment to other carriers.

In order to satisfy the needs of the State of South Dakota, CenturyLink submitted a request for a block of numbers (1,000 numbers) to PA/NeuStar on July 10, 2012. The request was immediately denied because CenturyLink's current Rate Center Month to Exhaust (MTE) and Rate Center Utilization did not meet the requirement. In order for the request to be approved, CenturyLink will require a waiver of the current utilization threshold for this application. The original request and subsequent denial have been provided with this letter as an attachment.

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The FCC allows for a waiver of the rules when there is demonstrated need to service a specific customer request. The waiver process is specifically addressed in the FCC Third Report and Order (“Order”) as the “safety valve” process (See FCC 01-362, paras. 57-66), which went into effect on March 14, 2002. The Order delegates the authority to hear claims for waivers to the state commissioners and recommends that state commissions act expeditiously. The Order proposes that state commissions review a waiver within 10 business days. (See Paras. 61, 66)

CenturyLink respectfully requests that the Commission approve the request for a waiver of utilization threshold requirements and direct PA/NeuStar to open a new NXX and provide a block (1,000 numbers) in the Sioux Falls Rate Center in the 605 NPA for the SXFLSDCODS1 switch, as outlined in this request to allow us to meet this specific customer request.

The directive can be mailed, emailed or faxed directly to:

Genevieve Bettiga
PA Code Administrator
NeuStar, Inc.
1800 Sutter St. Ste. 780
Concord, CA 94520
Phone: 925-363-7652
Fax: 925-363-7683
Email: Genevieve.Bettiga@neustar.biz

Thank you for your attention to this matter. Should you have any questions or concerns about this request, please do not hesitate to contact Bruce Bennett at 303-707-7013. I would appreciate being copied on any correspondence with PA/NeuStar.

Respectfully submitted,

/s/ Wayne Johnson

Wayne Johnson
State Regulatory Affairs Director

Attachment